## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN -NORTHERN DIVISION

In the matter of:		Case No: 15-20124
Virginia D Heighes,		Chapter 13 Proceeding
	Debtor(s)./	Honorable Daniel S. Opperman

## EX PARTE MOTION FOR APPROVAL OF LOAN MODIFICATION

**NOW COMES** the Debtor), Virginia D Heighes, by and through counsel, Kimberly Kramer, P.L.C., by Kimberly A. Kramer, and hereby move this Court for an Ex Parte Order authorizing Chapter 13 Debtor herein to enter into a loan modification and in support thereof states as follows:

- 1. That Debtor filed her Chapter 13 petition on January 27, 2015;
- 2. That Debtor has qualified for a loan modification on the property located at 1171 Burbank Pl Saginaw, MI 48638 at the terms disclosed below; (Exhibit "A")

New Principal & Interest Payment: \$419.70 New Taxes & Insurance Payment: \$258.25 **TOTAL New Monthly Payment:** \$677.95

New Term/Maturity Date: 480 months / August 1, 2057

New Interest Rate: 4.250% New Unpaid Balance: \$96,790.87

- 3. That Thomas W. McDonald, Jr., Chapter 13 Trustee will continue paying this debt through Debtor's Chapter 13 Plan;
- 4. That a proposed Order is attached; (Exhibit "B")

**WHEREFORE** Debtor respectfully requests this Honorable Court enter an Order authorizing Debtor to modify her loan.

Dated: May 17, 2017	Respectfully submitted,
	/s/Kimberly A. Kramer

KIMBERLY A. KRAMER (P59045)

Attorney for Debtor(s)

916 Washington Ave., Ste. 320

Bay City, MI 48708

(989) 671-4333

Kimberlykramerplc@sbcglobal.net

APPROVED BY:

/s/ Thomas W. McDonald, Jr.

THOMAS W. MCDONALD, JR. (P32464)

Chapter 13 Trustee

3144 Davenport Avenue

Saginaw, MI 48602

(989) 792-6766

Tom@mcdonald13.org